IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

In re: \$ Chapter 11 \$ BPZ Resources, Inc., \$ Case No.: 15-60016 \$ Debtor.

NOTICE OF DESIGNATION OF COMPLEX CHAPTER 11 CASE

BPZ Resources, Inc. (the "<u>Debtor</u>") filed its voluntary petition for relief pursuant to Chapter 11 of the United States Code, 11 U.S.C. § 101, et seq. (the "<u>Bankruptcy Code</u>") on March 9, 2015. The Debtor believes its bankruptcy case (the "<u>Case</u>") qualifies, under General Order 2009-2, as a Complex Chapter 11 Bankruptcy case because:

- 1. As of September 30, 2014 (according to the 10-Q filed on November 7, 2014) the Debtor lists aggregate liabilities of \$275,247,000.
 - 2. There are more than 50 parties-in-interest in the Case.
 - 3. Shares of the Debtor are publicly traded.
- 4. There is a significant need for simplification of noticing and hearing procedures to reduce delays and expenses in this Case.

Dated: March 9, 2015 Respectfully submitted,

HAWASH MEADE GASTON NEESE & CICACK LLP

By: /s/ Walter J. Cicack

WALTER CICACK

Texas State Bar No. 04250535

2118 Smith Street Houston, Texas 77002 Telephone: (713) 658-9001 Facsimile: (713) 658-9011

and

STROOCK & STROOCK & LAVAN LLP

Kristopher M. Hansen (*pro hac vice* application pending) Frank A. Merola (*pro hac vice* application pending) Matthew G. Garofalo (*pro hac vice* application pending) 180 Maiden Lane New York, NY 10038

Telephone: (212) 806-5400 Facsimile: (212) 806-6006

PROPOSED ATTORNEYS FOR THE DEBTOR AND DEBTOR-IN-POSSESSION